United States Department of Agriculture
Food Safety and Inspection Service
Washington, D.C. 20250

JUN 18 2004

Dr. Osmo Maki-Petays
Head of Meat Hygiene Unit
National Veterinary & Food Research Institute
Hameentie 57
Fin-00231 Helsinki, Finland

Dear Dr. Maki-Petays:

The Food Safety and Inspection Service completed an on-site audit of Finland's meat inspection system. The audit was conducted from January 12 through 29, 2004. Comments from Finland have been included in the final report. Enclosed is a copy of the final report.

If you have any questions regarding the audit or need additional information, please contact me by telephone at 202-720-3781, by fax at 202-690-4040, or by e-mail at sally.white@fsis.usda.gov.

Sincerely,

Steven McDermott
for

Sally White, Director
International Equivalence Staff
Office of International Affairs

Enclosure

cc:
Alejandro Checchi-Lang, Director, Directorate E, European Commission, Brussels
Lana Bennett, Minister Counselor, American Embassy, Stockholm
Hannele Tikkanen, Agric. Counselor, Embassy of Finland
Norval Francis, Minister-Counselor, US Mission to the EU in Brussels
Tony Van der haegen, EU Mission to the US, Washington, DC
James Dever, FAS Area Officer
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Jack Mowbray, IES, OIA, FSIS
Country File

FINAL

FINAL REPORT OF AN AUDIT CARRIED OUT IN FINLAND
COVERING FINLAND'S MEAT PRODUCT INSPECTION SYSTEM

January 12 through January 29, 2004

Food Safety and Inspection Service
United States Department of Agriculture

TABLE OF CONTENTS

14. CLOSING MEETING

15. ATTACHMENTS TO THE AUDIT REPORT

ABBREVIATIONS AND SPECIAL TERMS USED IN THE REPORT

CCA	Central Competent Authority
E. coli	*Escherichia coli*
FSIS	Food Safety and Inspection Service
PR/HACCP	Pathogen Reduction/Hazard Analysis and Critical Control Points Systems
NFA	National Food Agency
NOID	Notice of Intent to Delist
Salmonella	*Salmonella* species
SSOP	Sanitation Standard Operating Procedure(s)
VEA	European Community (EC)/United States Veterinary Equivalence Agreement

1. INTRODUCTION

The audit took place in Finland from January 12 through January 29, 2004.

An opening meeting was held on January 12, 2004, in Helsinki with the Central Competent Authority (CCA). At this meeting, the auditors confirmed the objective and scope of the audit, the auditors' itinerary, and requested additional information needed to complete the audit of Finland's meat inspection system.

The auditors were accompanied during the entire audit by representatives from the CCA, the National Food Agency (NFA).

2. OBJECTIVE OF THE AUDIT

This was a routine annual audit. The objective of the audit was to evaluate the performance of the CCA with respect to controls over the slaughter and processing establishments certified by the CCA as eligible to export meat products to the United States.

In pursuit of the objective, the following sites were visited: the headquarters of the CCA, one provincial inspection office, one government-owned residue laboratory and one private microbiology laboratory performing analytical testing on United States-eligible product, three slaughter and processing establishments, one slaughter establishment, and one cold storage facility.

Competent Authority Visits			Comments
Competent Authority	Central	1	Helsinki
	Provincial	1	Helsinki
	Local	4	Establishment level
Laboratories		2	
Meat Slaughter and Processing Establishments		4	
Cold Storage Facilities		1	

3. PROTOCOL

This on-site audit was conducted in four parts. One part involved visits with CCA officials to discuss oversight programs and practices, including enforcement activities. The second part involved on-site visits to five establishments: three slaughter and cutting establishments, one slaughter establishment and one cold storage facility. The third part involved visits to one government-owned and -operated residue laboratory and one private microbiology laboratory. The National Veterinary and Food Research Institute laboratory in Helsinki and *HK Ruokatalo Oyj Laboratory* in Forssa were conducting, respectively, analyses of field samples for residues and microbiology for the establishments certified to export product to the United States.

Program effectiveness determinations of Finland's inspection system focused on five areas of risk: (1) sanitation controls, including the implementation and operation of Sanitation Standard Operating Procedures (SSOP), (2) animal disease controls, (3) slaughter/processing controls, including the implementation and operation of HACCP programs, (4) residue controls, and (5) enforcement controls. Finland's inspection system was assessed by evaluating these five risk areas.

During all on-site establishment visits, the auditors evaluated the nature, extent and degree to which findings impacted on food safety and public health. The auditors also assessed how inspection services are carried out by Finland and also determined if establishment and inspection system controls were in place to ensure the production of meat products that are safe, unadulterated and properly labeled.

During the opening meeting, the auditors explained to the CCA that their inspection system would be audited in accordance with three areas of focus. First, under provisions of the European Community (EC)/United States Veterinary Equivalence Agreement (VEA), the FSIS auditors would audit the meat inspection system against EC Directive 64/433/EEC of June 1964; EC Directive 96/22/EC of April 1996; and EC Directive 96/23/EC of April 1996. These directives have been declared equivalent under the VEA.

Second, in areas not covered by these directives, the auditors would audit against FSIS requirements. These include daily inspection in all certified establishments, humane handling and slaughter of animals, the handling and disposal of inedible and condemned materials, species verification, and FSIS requirements for HACCP, SSOP, and testing for generic *E. coli* and *Salmonella* species.

Third, the auditors would audit against any equivalence determinations that have been made by FSIS for Finland under provisions of the Sanitary/Phytosanitary Agreement. One alternate procedure has been recognized as equivalent: testing for generic *E. coli* is performed by the CCA and testing for *Salmonella* species is performed by the establishment under CCA supervision.

4. LEGAL BASIS FOR THE AUDIT

The audit was undertaken under the specific provisions of United States laws and regulations, in particular:

- The Federal Meat Inspection Act (21 U.S.C. 601 et seq.).
- The Federal Meat Inspection Regulations (9 CFR Parts 301 to End), which include the Pathogen Reduction/HACCP regulations.

In addition, compliance with the following EC Directives was also assessed:

- EC Directive 64/433/EEC, of June 1964, entitled "Health Problems Affecting Intra-Community Trade in Fresh Meat"

- EC Directive 96/23/EC, of 29 April 1996, entitled "Measures to Monitor Certain Substances and Residues Thereof in Live Animals and Animal Products"
- EC Directive 96/22/EC, of 29 April 1996, entitled "Prohibition on the Use in Stockfarming of Certain Substances Having a Hormonal or Thyrostatic Action and of ß-agonists"

5. SUMMARY OF PREVIOUS AUDITS

Final audit reports are available on FSIS' website at the following address: http://199.140.65.44/regulations_&_policies/Foreign_Audit_Reports/index.asp

The last two audits of Finland's inspection system have shown several problems. During the September 2002 audit of Finland's inspection system, the following deficiencies were identified:

- In one establishment, pre-operational cleaning of some product-contact surfaces was inadequate.

- In one establishment, maintenance of over-product structures had been seriously neglected.

- In one establishment, light intensities at some post-mortem inspection stations did not meet either E.C. or U.S. requirements.

- In two establishments, several stainless combo bins, which were being used for exposed product, were cracked and in need of repair.

- In one establishment, several white plastic containers, intended for edible product, were found to be used for other purposes without being labeled appropriately.

- In one establishment, the in-plant NFA personnel and the slaughter foreman were usually not notified when contamination with ingesta or feces was found at the pre-boning trim station.

- In one establishment, a review of the monitoring records for the Critical Control Point (CCP) for absence of visible contamination with ingesta/feces showed that the critical limit had been exceeded on six of the past seventeen days, and up to three times per day on several of those days.

- In one establishment, the written preventive measures required when visible contamination with ingesta or feces is found after the CCP for absence of visible contamination was not being followed.

- In one of the four slaughter establishments, testing for generic *E. coli* was not conducted properly.

- In all establishments, establishment personnel were taking samples for generic *E. coli;* whereas this should have been done by the government officials.

- In one establishment, the NFA personnel were taking samples for *Salmonella* species, whereas the establishment employee should have taken the samples.

- In the residue laboratory, there were no written corrective actions to be followed in the event that an analyst's performance did not meet expectations.

All of the deficiencies identified in September 2002 had been corrected by the next audit in March 2003.

In the FSIS audit of March 2003, the following deficiencies were identified:

- In two establishments, maintenance and cleaning of over-product structures had been neglected to varying degrees in several production areas, although no direct product contamination resulting from the neglect was observed during the audit.

- In one establishment, general housekeeping in the chemical storage area had been neglected.

- In one establishment, cross-contamination was observed between a carcass that was railed out and another carcass that had fallen on the floor.

6. MAIN FINDINGS

6.1 Legislation

The auditors were informed that the relevant EC Directives, determined to be equivalent under the VEA, had been transposed into Finland's legislation.

6.2 Government Oversight

The NFA has the organizational structure and staffing to ensure uniform implementation of U.S. requirements. It is responsible for directing, planning, and developing food control in Finland and for exercising enforcement over the food inspection system. Activities cover the control of all foodstuffs from farm to table. The NFA guides the municipal food control authorities, provincial governments, and the National Board of Customs, which perform the practical control. The NFA is subordinate to the Ministry of Agriculture and Forestry.

6.2.1 CCA Control Systems

The NFA is divided into five units: the Meat and Fish Hygiene Unit, the Milk and Egg Hygiene Unit, the Health Protection Unit, the Food Control Unit, and the Administrative Unit. The Meat and Fish Hygiene Unit is responsible for guidance and direction tasks under the relevant hygiene acts. This unit is also responsible for some tasks under the Act

on the Implementation of the Common Agricultural Policy. The unit develops the uniformity and efficiency of food control in its own area. The meat inspection personnel (approximately 100) belong to this Unit. The NFA cooperates closely with the National Veterinary and Food Research Institute and the Plant Production Inspection Centre.

The Ministry of Agriculture and Forestry transposes all relevant European Union legislation into Finnish law.

Mainland Finland is divided into five Provinces. Three of the establishments certified for U.S.-export are located in the Province of Western Finland and two in the Province of Southern Finland. This audit included a visit to the Provincial Veterinary Office in the Province of Southern Finland.

Guidelines have been developed by a crisis working group in the NFA to be implemented in the case any terrorism activities are suspected.

6.2.2 Ultimate Control And Supervision

The tasks of the NFA include meat inspection and control in slaughterhouses and other establishments, approval of the slaughterhouses and establishments in connection with slaughterhouses, national testing programs for residues and for *Salmonella* species in meat, and controls for meat exports outside the European Union. The in-plant inspection personnel are supervised both by the NFA Senior Veterinary Officers (stationed in Helsinki) and by the Provincial Veterinary Officers (PVOs), who perform the monthly internal reviews of the establishments certified as eligible to produce products for U.S. export. Under the current system, all issues that may arise regarding animal health and welfare are expected to be channeled through the PVOs. The PVOs carry the responsibility to evaluate and report on the performance of the in-plant inspection personnel and export procedures. The PVOs, in turn, are also supervised by the NFA Senior Veterinary Officers in Helsinki.

The PVOs discuss their routine evaluation of the performances of the in-plant inspection personnel during the internal reviews. If they have any concerns, they discuss this with their supervisors after the audit is completed.

Nationally developed inspection forms are in use in all establishments for supervision of establishment compliance. A guideline of written instructions for supervision of establishments eligible for U.S. export, including evaluating PR/HACCP programs and compliance with other FSIS requirements has been developed and implemented.

The EC's regulations regarding movement, identification, and traceability of animals are enforced in Finland.

The national residue testing program is jointly developed, implemented, and applied by (1) the NFA, (2) the National Veterinary and Food Research Institute, and (3) the Ministry of Agriculture and Forestry.

6.2.3 Assignment of Competent, Qualified Inspectors

Veterinarians take courses in meat inspection in the curriculum of their formal education. After graduation, they take further special courses in meat inspection, including four weeks of practical training. They must then pass specific examinations before being qualified to work in establishments. Non-veterinary "auxiliaries" have courses involving 200 hours of practical training on slaughter line and 400 hours of theoretical class work, after which they must also pass specific examination before being qualified to work in export meat establishments.

In-plant inspection personnel, their supervisors (the Provincial Veterinarians), and headquarters officials have participated in additional HACCP training.

No part-time or full-time government employees are allowed to perform private, establishment-paid tasks at an establishment in which they perform official duties. Private-practicing veterinarians may be hired as temporary or part-time government employees in establishments certified for U.S. export.

The NFA charges the establishments monthly for inspection services, according to the applicable European Union Directive, which has been transposed into Finnish legislation, and pays the field inspection personnel directly.

6.2.4. Authority and Responsibility to Enforce the Laws

The NFA has the authority and the responsibility to enforce U.S. and E.C. requirements.

6.2.5. Adequate Administrative and Technical Support

The NFA has adequate administrative and technical support to operate Finland's inspection system and has the resources and ability to support a third-party audit. The NFA is responsible for hiring veterinarians and other inspection personnel and determines the allocation of personnel to the establishments.

6.3 Headquarters Audit

The auditors conducted a review of inspection system documents at the headquarters, provincial and in-plant inspection offices at the audited establishments. The records reviews focused primarily on food safety hazards and included the following:

- Internal review reports,
- Supervisory visits to establishments that were certified to export to the U.S.,
- Training records for inspectors and laboratory personnel,
- Animal disease status,
- Supervisory visits to U.S. certified establishments,
- Label approval records,
- New laws and implementation documents such as regulations, notices, directives and guidelines,

- Official communications with field personnel, both in-plant and supervisory, in U.S. certified establishments,
- Sampling and laboratory analyses for residues,
- Sanitation, and slaughter inspection procedures and standards,
- Species verification policy,
- Export product inspection and control including export certificates, and
- Enforcement actions.

No concerns arose as a result of the examination of these documents.

6.3.1. Audits of Regional and Local Inspection Sites

The provincial inspection office in Helsinki was audited on January 26, 2004, to gain insight into the oversight of establishment-level inspection controls. No concerns arose as a result of this audit.

7. ESTABLISHMENT AUDITS

The FSIS auditors visited three slaughter and processing establishments, one slaughter establishment, and one cold storage facility. None of the five establishments was delisted by Finland's inspection service as a result of failure to meet FSIS requirements. One establishment received a Notice of Intent to Delist (NOID) from the NFA because of SSOP implementation deficiencies. This establishment may retain its certification for export to the United States provided that the management corrects all deficiencies noted during the audit within 30 days of the date the establishment was audited, or it is to be delisted by the NFA.

8. RESIDUE AND MICROBIOLOGY LABORATORY AUDITS

During laboratory audits, emphasis is placed on the application of procedures and standards that are equivalent to United States requirements.

Residue laboratory audits focus on sample handling, sampling frequency, timely analysis, data reporting, analytical methodologies, tissue matrices, equipment operation and printouts, detection levels, recovery frequency, percent recoveries, and intra-laboratory check sample and quality assurance programs, including standards books and corrective actions.

Microbiology laboratory audits focus on analyst qualifications, sample receipt, timely analysis, analytical methodologies, analytical controls, recording and reporting of results, and check sample programs. If private laboratories are used to test United States samples, the auditors evaluate compliance with the criteria established for the use of private laboratories under the FSIS HACCP/PR requirements.

The following laboratories were audited:

The government-owned and -operated National Veterinary and Food Research Institute laboratory in Helsinki is the reference laboratory for residue testing.

The private *HK Ruokatalo Oyj* Laboratory in Forssa conducts analyses of field samples for microbiology for the establishments certified to export product to the U.S.

The findings in these laboratories will be discussed in Section 11.3 (Testing for generic *E. coli*), 12 (RESIDUE CONTROLS), and 13.2 (Testing for *Salmonella* species) of this report.

9. SANITATION CONTROLS

As stated earlier, the FSIS auditors focused on five areas of risk to assess an exporting country's meat inspection system. The first of these risk areas that the FSIS auditors reviewed was Sanitation Controls.

Based on the on-site audits of establishments, and except as noted below, Finland's inspection system had controls in place for SSOP programs, all aspects of facility and equipment sanitation, the prevention of actual or potential instances of product cross-contamination, good personal hygiene practices, and good product handling and storage practices.

In addition, and except as noted below, Finland's inspection system had controls in place for light, ventilation, plumbing and sewage, water supply, dressing rooms/lavatories, equipment and utensils, sanitary operations, employee hygiene, and condemned product control.

- In one establishment, containers designated for edible product were used for inedible product (416.3) (EC Dir. 64/433)

- In two establishments, product residues were observed on over-product structures (416.2b) (EC Dir. 64/433).

- In one establishment, NFA personnel were unable to interpret the reports from the pest control contractor (416.2a) (EC Dir. 64/433).

- In one establishment, condensation was noted on a refrigeration unit in one cooler (416.2d) (EC Dir. 64/433).

- In one establishment, a roll of plastic for edible product was contacting the floor and plastic for packaging was stored in a container designated for inedible materials (416.4a) (EC Dir. 64/433).

9.1 SSOP

Each establishment was evaluated to determine if the basic FSIS regulatory requirements for SSOP were met, according to the criteria employed in the U.S. domestic inspection program. The SSOP in all four establishments were found to meet the basic FSIS regulatory requirements, with the following deficiencies in the implementation of SSOP.

- In one establishment, fat and meat particles were observed on white tubs that were ready for use for edible product (9 CFR 416.13).

- In one establishment, an unclean carcass hoist hook was contacting edible product (9 CFR 416.15).

- In three establishments, the SSOP records did not include adequate descriptions of deficiencies found and corrective actions taken (9 CFR 416.16).

9.2 EC Directive 64/433

In two establishments, the provisions of EC Directive 64/433 were effectively implemented. In the other three establishments, deficiencies were identified. The specific deficiencies are noted in the attached individual establishment reports.

10. ANIMAL DISEASE CONTROLS

The second of the five risk areas that the FSIS auditors reviewed was Animal Disease Controls. These include ensuring adequate animal identification, control over condemned and restricted product, and procedures for sanitary handling of returned and reconditioned product. The auditors determined that Finland's inspection system had adequate controls in place. No deficiencies were noted.

There had been no outbreaks of animal diseases with public health significance since the last FSIS audit.

11. SLAUGHTER/PROCESSING CONTROLS

The third of the five risk areas that the FSIS auditors reviewed was Slaughter/Processing Controls. The controls include the following areas: ante-mortem inspection procedures; ante-mortem dispositions; humane handling and humane slaughter; post-mortem inspection procedures and dispositions; ingredients identification; control of restricted ingredients, formulations, processing schedules, equipment, and records; and processing controls of cured, dried, and cooked products.

The controls also include the implementation of HACCP systems in all establishments and implementation of a testing program for generic *E. coli* in slaughter establishments.

11.1 Humane Handling and Humane Slaughter

No deficiencies were identified regarding humane handling or humane slaughter.

11.2 HACCP Implementation

- In two establishments, calibration of the equipment for monitoring critical limits was not clearly defined in the written HACCP plan (9 CFR 417.4).

- In one establishment, the written descriptions of monitoring and verification procedures were not clear. Both were performed, but the records did not reflect the correct terminology (9 CFR 417.4).

11.3 Testing for Generic *E. coli*

No deficiencies were identified regarding the testing programs for generic *E. coli.*

11.4 Testing for *Listeria monocytogenes*

None of the five establishments was producing ready-to-eat products for export to the United States. Accordingly, FSIS requirements for testing for *Listeria monocytogenes* did not apply.

11.4 EC Directive 64/433

In all five establishments, the provisions of EC Directive 64/433 regarding humane handling and humane slaughter were effectively implemented.

12. RESIDUE CONTROLS

The fourth of the five risk areas that the FSIS auditors reviewed was Residue Controls.

The government-owned and -operated National Veterinary and Food Research Institute laboratory in Helsinki was audited. The following observation was made:

- Some recoveries for sulfonamides were as low as 50%. FSIS expects a minimum of 70% recovery for sulfonamides.

12.1 FSIS Requirements

At the time of this audit, four slaughter establishments and one cold-storage facility were certified for U.S. export.

12.2 EC Directive 96/22

In the National Veterinary and Food Research Institute laboratory in Helsinki, the provisions of EC Directive 96/22 were effectively implemented.

12.2 EC Directive 96/23

In the National Veterinary and Food Research Institute laboratory in Helsinki, the provisions of EC Directive 96/23 were effectively implemented.

13. ENFORCEMENT CONTROLS

The fifth of the five risk areas that the FSIS auditors reviewed was Enforcement Controls. These controls include the enforcement of inspection requirements and the testing program for *Salmonella* species.

13.1 Daily Inspection in Establishments

Inspection was being conducted daily and was well-documented in all five establishments.

13.2 Testing for *Salmonella* Species

No deficiencies were identified regarding the testing programs for *Salmonella* species.

13.3 Species Verification

At the time of this audit, Finland was required to test product for species verification. Species verification was being conducted in those establishments in which it was required.

13.4 Monthly Reviews

During this audit it was found that in all establishments visited, monthly supervisory reviews of certified establishments were being performed and documented as required.

13.5 Inspection System Controls

The CCA had controls in place for prevention of commingling of product intended for export to the U.S. with product intended for the domestic market.

- Two of five establishments audited had inadequate enforcement of U.S. requirements.

In addition, controls were in place for the importation of only eligible livestock from other countries, i.e., only from eligible third countries and certified establishments within

those countries, and the importation of only eligible meat products from other counties for further processing.

Lastly, adequate controls were found to be in place for security items, shipment security, and products entering the establishments from outside sources.

14. CLOSING MEETING

A closing meeting was held on January 28, 2004, in Helsinki with the CCA. At this meeting, the primary findings and conclusions from the audit were presented by the auditors.

The CCA understood and accepted the findings.

Dr. Oto Urban
International Audit Staff Officer

15. ATTACHMENTS TO THE AUDIT REPORT

Individual Foreign Establishment Audit Forms
Individual Foreign Laboratory Forms
Foreign Country Response to Draft Final Audit Report

U.S. DEPARTMENT OF AGRICULTURE
FOOD SAFETY AND INSPECTION SERVICE
INTERNATIONAL PROGRAMS

FOREIGN COUNTRY LABORATORY REVIEW

REVIEW DATE	NAME OF FOREIGN LABORATORY
1-22-04	National Veterinary and Food Research Institute (EELA)

FOREIGN GOV'T AGENCY	CITY & COUNTRY	ADDRESS OF LABORATORY
National Food Agency	Helsinki, Finland	Helsinki, Finland

NAME OF REVIEWER	NAME OF FOREIGN OFFICIAL
Dr. Oto Urban	Ann Farerlund, NFA, Seija Berg EELA

	Residue Code/Name ▶		100	111	300	200	203	400	500	800	923	SPE
	REVIEW ITEMS	ITEM #										
SAMPLING PROCEDURES	Sample Handling	01	A	A	A	A	A	A	A	A	A	A
	Sampling Frequency	02	A	A	A	A	A	A	A	A	A	A
	Timely Analyses	03	A	A	A	A	A	A	A	A	A	A
	Compositing Procedure	04	O	O	O	O	O	O	O	O	O	O
	Interpret Comp Data	05	O	O	O	O	O	O	O	O	O	O
	Data Reporting	06	A	A	A	A	A	A	A	A	A	A
ANALYTICAL PROCEDURES	Acceptable Method	07	A	A	A	A	A	A	A	A	A	C
	Correct Tissue(s)	08	A	A	A	A	A	A	C	C	C	A
	Equipment Operation	09	A	A	A	A	A	A	A	A	A	A
	Instrument Printouts	10	A	A	A	A	A	A	A	A	A	A
QUALITY ASSURANCE PROCEDURES	Minimum Detection Levels	11	A	A	A	A	A	A	A	A	A	A
	Recovery Frequency	12	A	A	A	A	A	A	A	A	A	O
	Percent Recovery	13	A	A	A	A	A	A	A	C	A	A
	Check Sample Frequency	14	A	A	A	A	A	A	A	A	A	A
	All analyst w/Check Samples	15	A	A	A	A	A	A	A	A	A	A
	Corrective Actions	16	A	A	A	A	A	A	A	A	A	A
	International Check Samples	17	A	A	A	O	A	A	A	A	A	A
REVIEW PROCEDURES	Corrected Prior Deficiencies	18	O	O	O	O	O	O	O	O	O	O
OTHER REVIEW		19										
		20										

EVALUATION CODE / EVAL. CODE

SIGNATURE OF REVIEWER
for Manpoor H. Chaudry

DATE
2/17/04

FOREIGN COUNTRY LABORATORY REVIEW *(Comment Sheet)*	REVIEW DATE	NAME OF FOREIGN LABORATORY
	1-22-04	National Veterinary and Food Research Institute (EELA)

FOREIGN GOV'T AGENCY	CITY & COUNTRY	ADDRESS OF LABORATORY
National Food Agency	Helsinki, Finland	Helsinki, Finland

NAME OF REVIEWER	NAME OF FOREIGN OFFICIAL
Dr. Oto Urban	Ann Farerlund, NFA, Seija Berg EELA

RESIDUE	ITEM	COMMENTS
Species	07	Cooked meat methodology for species verification testing was applied on raw meat samples destined to export to U.S.
501,800, 923	08	The following tissue matrices were used: for DES - urine and feces, for sulfonamides - muscle, and for ivermectin - liver.
800	13	Some recoveries for sulfonamides were as low as 50%. FSIS expects a minimum of 70% recovery for sulfonamides.

U.S. DEPARTMENT OF AGRICULTURE
FOOD SAFETY AND INSPECTION SERVICE
INTERNATIONAL PROGRAMS

FOREIGN COUNTRY LABORATORY REVIEW

REVIEW DATE	NAME OF FOREIGN LABORATORY
01-19-04	Ruokatalo Oyj, Forssan Laboratory in Forssa

FOREIGN GOV'T AGENCY	CITY & COUNTRY	ADDRESS OF LABORATORY
National Food Agency	Forssa, Finland	Forssa, Finland

NAME OF REVIEWER	NAME OF FOREIGN OFFICIAL
Dr. Oto Urban	Drs. Anna-Maija Gronlund, Marjoriikka Keranen

Residue Code/Name ▶ Ecol

	REVIEW ITEMS	ITEM #	EVALUATION CODE
SAMPLING PROCEDURES	Sample Handling	01	A
	Sampling Frequency	02	A
	Timely Analyses	03	A
	Compositing Procedure	04	O
	Interpret Comp Data	05	O
	Data Reporting	06	A
ANALYTICAL PROCEDURES	Acceptable Method	07	A
	Correct Tissue(s)	08	A
	Equipment Operation	09	A
	Instrument Printouts	10	O
QUALITY ASSURANCE PROCEDURES	Minimum Detection Levels	11	O
	Recovery Frequency	12	O
	Percent Recovery	13	O
	Check Sample Frequency	14	A
	All analyst w/Check Samples	15	A
	Corrective Actions	16	A
	International Check Samples	17	A
REVIEW PROCEDURES	Corrected Prior Deficiencies	18	O
OTHER REVIEW		19	
		20	

EVAL. CODE

SIGNATURE OF REVIEWER
for Manzoor H. Chaudry

DATE
2/17/04

United States Department of Agriculture
Food Safety and Inspection Service

Foreign Establishment Audit Checklist

1. ESTABLISHMENT NAME AND LOCATION	2. AUDIT DATE	3. ESTABLISHMENT NO.	4. NAME OF COUNTRY
HK Ruokatalo Oyj FORSSA	01 – 19 - 04	18	Finland
	5. NAME OF AUDITOR(S)	6. TYPE OF AUDIT	
	Dr. Oto Urban	[X] ON-SITE AUDIT [ ] DOCUMENT AUDIT	

Place an X in the Audit Results block to indicate noncompliance with requirements. Use O if not applicable.

Part A - Sanitation Standard Operating Procedures (SSOP) Basic Requirements	Audit Results
7. Written SSOP	
8. Records documenting implementation.	
9. Signed and dated SSOP, by on-site or overall authority.	
Sanitation Standard Operating Procedures (SSOP) Ongoing Requirements	
10. Implementation of SSOP's, including monitoring of implementation.	
11. Maintenance and evaluation of the effectiveness of SSOP's.	
12. Corrective action when the SSOP's have failed to prevent direct product contamination or adulteration.	
13. Daily records document item 10, 11 and 12 above.	X
Part B - Hazard Analysis and Critical Control Point (HACCP) Systems - Basic Requirements	
14. Developed and implemented a written HACCP plan .	
15. Contents of the HACCP list the food safety hazards, critical control points, critical limits, procedures, corrective actions.	
16. Records documenting implementation and monitoring of the HACCP plan.	
17. The HACCP plan is signed and dated by the responsible establishment individual.	
Hazard Analysis and Critical Control Point (HACCP) Systems - Ongoing Requirements	
18. Monitoring of HACCP plan.	
19. Verification and validation of HACCP plan.	X
20. Corrective action written in HACCP plan.	
21. Reassessed adequacy of the HACCP plan.	
22. Records documenting: the written HACCP plan, monitoring of the critical control points, dates and times of specific event occurrences.	
Part C - Economic / Wholesomeness	
23. Labeling - Product Standards	O
24. Labeling - Net Weights	O
25. General Labeling	O
26. Fin. Prod. Standards/Boneless (Defects/AQL/Pork Skins/Moisture)	O
Part D - Sampling Generic *E. coli* Testing	
27. Written Procedures	
28. Sample Collection/Analysis	
29. Records	
Salmonella Performance Standards - Basic Requirements	
30. Corrective Actions	
31. Reassessment	
32. Written Assurance	

Part D - Continued Economic Sampling	Audit Results
33. Scheduled Sample	
34. Species Testing	
35. Residue	
Part E - Other Requirements	
36. Export	
37. Import	
38. Establishment Grounds and Pest Control	X
39. Establishment Construction/Maintenance	
40. Light	
41. Ventilation	X
42. Plumbing and Sewage	
43. Water Supply	
44. Dressing Rooms/Lavatories	
45. Equipment and Utensils	
46. Sanitary Operations	X
47. Employee Hygiene	
48. Condemned Product Control	
Part F - Inspection Requirements	
49. Government Staffing	
50. Daily Inspection Coverage	
51. Enforcement	X
52. Humane Handling	
53. Animal Identification	
54. Ante Mortem Inspection	
55. Post Mortem Inspection	
Part G - Other Regulatory Oversight Requirements	
56. European Community Directives	X
57. Monthly Review	
58.	
59.	

60. Observation of the Establishment

FINLAND - Est.18 01-19-04

13/51. Establishment pre-operational sanitation inspection records did not include descriptions of the deficiencies found. (9 CFR 416.16)

19/51. Calibration, although performed, was not clearly delineated and the frequency and procedures will be reevaluated. (9 CFR 417.4)

38/51/56. NFA personnel were not able to interpret the results sheets from the pest control contactor. No actual pest control problems were observed. (9 CFR 416.2a) (EC Dir. 64/433)

41/56. Condensation was noted on the cooling system in the cooler. No product contamination was observed. The establishment immediately wiped the area. (9 CFR 416.2d) (EC Dir. 64/433)

46/56. A large jug of liquid in the equipment cleaning room was noticed to be unlabeled. The jug was immediately removed and the contents disposed of. A roll of plastic was on a stand that allowed it to touch the floor. This was immediately removed from the area. In the blender room, plastic to be used as a packaging material was being stored in an inedible-designed container. This plastic was disposed of. (9 CFR 416.4a) (EC Dir. 64/433)

61. NAME OF AUDITOR

Dr. Oto Urban

62. AUDITOR SIGNATURE AND DATE

for Manjeet H. Chaudry 2/17/04

United States Department of Agriculture
Food Safety and Inspection Service

Foreign Establishment Audit Checklist

1. ESTABLISHMENT NAME AND LOCATION	2. AUDIT DATE	3. ESTABLISHMENT NO.	4. NAME OF COUNTRY
Atria Oy Nurmo	01 - 14 - 04	22	Finland
	5. NAME OF AUDITOR(S)	6. TYPE OF AUDIT	
	Dr. Oto Urban	[X] ON-SITE AUDIT	[ ] DOCUMENT AUDIT

Place an X in the Audit Results block to indicate noncompliance with requirements. Use O if not applicable.

Part A - Sanitation Standard Operating Procedures (SSOP) Basic Requirements	Audit Results
7. Written SSOP	
8. Records documenting implementation.	
9. Signed and dated SSOP, by on-site or overall authority.	
Sanitation Standard Operating Procedures (SSOP) Ongoing Requirements	
10. Implementation of SSOP's, including monitoring of implementation.	
11. Maintenance and evaluation of the effectiveness of SSOP's.	
12. Corrective action when the SSOP's have failed to prevent direct product contamination or adulteration.	
13. Daily records document item 10, 11 and 12 above.	
Part B - Hazard Analysis and Critical Control Point (HACCP) Systems - Basic Requirements	
14. Developed and implemented a written HACCP plan .	
15. Contents of the HACCP list the food safety hazards, critical control points, critical limits, procedures, corrective actions.	
16. Records documenting implementation and monitoring of the HACCP plan.	
17. The HACCP plan is signed and dated by the responsible establishment individual.	
Hazard Analysis and Critical Control Point (HACCP) Systems - Ongoing Requirements	
18. Monitoring of HACCP plan.	
19. Verification and validation of HACCP plan.	
20. Corrective action written in HACCP plan.	
21. Reassessed adequacy of the HACCP plan.	
22. Records documenting: the written HACCP plan, monitoring of the critical control points, dates and times of specific event occurrences.	
Part C - Economic / Wholesomeness	
23. Labeling - Product Standards	O
24. Labeling - Net Weights	O
25. General Labeling	O
26. Fin. Prod. Standards/Boneless (Defects/AQL/Pork Skins/Moisture)	O
Part D - Sampling Generic *E. coli* Testing	
27. Written Procedures	
28. Sample Collection/Analysis	
29. Records	
Salmonella Performance Standards - Basic Requirements	
30. Corrective Actions	
31. Reassessment	
32. Written Assurance	

Part D - Continued Economic Sampling	Audit Results
33. Scheduled Sample	
34. Species Testing	
35. Residue	
Part E - Other Requirements	
36. Export	
37. Import	
38. Establishment Grounds and Pest Control	
39. Establishment Construction/Maintenance	
40. Light	
41. Ventilation	
42. Plumbing and Sewage	
43. Water Supply	
44. Dressing Rooms/Lavatories	
45. Equipment and Utensils	X
46. Sanitary Operations	X
47. Employee Hygiene	
48. Condemned Product Control	
Part F - Inspection Requirements	
49. Government Staffing	
50. Daily Inspection Coverage	
51. Enforcement	
52. Humane Handling	
53. Animal Identification	
54. Ante Mortem Inspection	
55. Post Mortem Inspection	
Part G - Other Regulatory Oversight Requirements	
56. European Community Directives	X
57. Monthly Review	
58.	
59.	

60. Observation of the Establishment

FINLAND - Est. 22 01-14-04

45/56 Containers designated for edible product only were used for inedible product in the deboning room (9 CFR 416.3) (EC Dir. 64/433). This deficiency was immediately corrected by the establishment management.

46/56 Overhead structures were observed with pieces of meat scraps and fat in the deboning room (9 CFR 416.4. b.) (EC Dir. 64/433). No product was directly exposed. This deficiency was corrected immediately by the establishment employee.

61. NAME OF AUDITOR

Dr. Oto Urban

62. AUDITOR SIGNATURE AND DATE

for Manzoor H. Chaudry 2/17/04

United States Department of Agriculture
Food Safety and Inspection Service

Foreign Establishment Audit Checklist

1. ESTABLISHMENT NAME AND LOCATION	2. AUDIT DATE	3. ESTABLISHMENT NO.	4. NAME OF COUNTRY
Oy Snellman Ab Pietarsaari	01 - 15 - 04	62	Finland
	5. NAME OF AUDITOR(S)		6. TYPE OF AUDIT
	Dr. Oto Urban		[X] ON-SITE AUDIT [ ] DOCUMENT AUDIT

Place an X in the Audit Results block to indicate noncompliance with requirements. Use O if not applicable.

Part A - Sanitation Standard Operating Procedures (SSOP) Basic Requirements	Audit Results
7. Written SSOP	
8. Records documenting implementation.	
9. Signed and dated SSOP, by on-site or overall authority.	
Sanitation Standard Operating Procedures (SSOP) Ongoing Requirements	
10. Implementation of SSOP's, including monitoring of implementation.	
11. Maintenance and evaluation of the effectiveness of SSOP's.	
12. Corrective action when the SSOPs have failed to prevent direct product contamination or adulteration.	
13. Daily records document item 10, 11 and 12 above.	
Part B - Hazard Analysis and Critical Control Point (HACCP) Systems - Basic Requirements	
14. Developed and implemented a written HACCP plan .	
15. Contents of the HACCP list the food safety hazards, critical control points, critical limits, procedures, corrective actions.	
16. Records documenting implementation and monitoring of the HACCP plan.	
17. The HACCP plan is signed and dated by the responsible establishment individual.	
Hazard Analysis and Critical Control Point (HACCP) Systems - Ongoing Requirements	
18. Monitoring of HACCP plan.	
19. Verification and validation of HACCP plan.	
20. Corrective action written in HACCP plan.	
21. Reassessed adequacy of the HACCP plan.	
22. Records documenting: the written HACCP plan, monitoring of the critical control points, dates and times of specific event occurrences.	
Part C - Economic / Wholesomeness	
23. Labeling - Product Standards	O
24. Labeling - Net Weights	O
25. General Labeling	O
26. Fin. Prod. Standards/Boneless (Defects/AQL/Pork Skins/Moisture)	O
Part D - Sampling Generic *E. coli* Testing	
27. Written Procedures	
28. Sample Collection/Analysis	
29. Records	
Salmonella Performance Standards - Basic Requirements	
30. Corrective Actions	
31. Reassessment	
32. Written Assurance	

Part D - Continued Economic Sampling	Audit Results
33. Scheduled Sample	
34. Species Testing	O
35. Residue	
Part E - Other Requirements	
36. Export	
37. Import	
38. Establishment Grounds and Pest Control	
39. Establishment Construction/Maintenance	
40. Light	
41. Ventilation	
42. Plumbing and Sewage	
43. Water Supply	
44. Dressing Rooms/Lavatories	
45. Equipment and Utensils	
46. Sanitary Operations	
47. Employee Hygiene	
48. Condemned Product Control	
Part F - Inspection Requirements	
49. Government Staffing	
50. Daily Inspection Coverage	
51. Enforcement	
52. Humane Handling	
53. Animal Identification	
54. Ante Mortem Inspection	
55. Post Mortem Inspection	
Part G - Other Regulatory Oversight Requirements	
56. European Community Directives	
57. Monthly Review	
58.	
59.	

60. Observation of the Establishment

FINLAND - Est. 62 01-15-04

No deficiencies observed.

61. NAME OF AUDITOR

Dr. Oto Urban

62. AUDITOR SIGNATURE AND DATE

for Mangros H. Chaudry 2/17/04

United States Department of Agriculture
Food Safety and Inspection Service

Foreign Establishment Audit Checklist

1. ESTABLISHMENT NAME AND LOCATION	2. AUDIT DATE	3. ESTABLISHMENT NO.	4. NAME OF COUNTRY
Koiviston Teurastamo Oy MELLILÄ	01 – 20 - 04	85	Finland
	5. NAME OF AUDITOR(S)		6. TYPE OF AUDIT
	Dr. Oto Urban		[X] ON-SITE AUDIT [ ] DOCUMENT AUDIT

Place an X in the Audit Results block to indicate noncompliance with requirements. Use O if not applicable.

Part A - Sanitation Standard Operating Procedures (SSOP) Basic Requirements	Audit Results
7. Written SSOP	
8. Records documenting implementation.	
9. Signed and dated SSOP, by on-site or overall authority.	
Sanitation Standard Operating Procedures (SSOP) Ongoing Requirements	
10. Implementation of SSOP's, including monitoring of implementation.	X
11. Maintenance and evaluation of the effectiveness of SSOP's.	
12. Corrective action when the SSOPs have failed to prevent direct product contamination or adulteration.	
13. Daily records document item 10, 11 and 12 above.	X
Part B - Hazard Analysis and Critical Control Point (HACCP) Systems - Basic Requirements	
14. Developed and implemented a written HACCP plan .	
15. Contents of the HACCP list the food safety hazards, critical control points, critical limits, procedures, corrective actions.	
16. Records documenting implementation and monitoring of the HACCP plan.	
17. The HACCP plan is signed and dated by the responsible establishment individual.	
Hazard Analysis and Critical Control Point (HACCP) Systems - Ongoing Requirements	
18. Monitoring of HACCP plan.	
19. Verification and validation of HACCP plan.	X
20. Corrective action written in HACCP plan.	
21. Reassessed adequacy of the HACCP plan.	
22. Records documenting: the written HACCP plan, monitoring of the critical control points, dates and times of specific event occurrences.	
Part C - Economic / Wholesomeness	
23. Labeling - Product Standards	O
24. Labeling - Net Weights	O
25. General Labeling	O
26. Fin. Prod. Standards/Boneless (Defects/AQL/Pork Skins/Moisture)	O
Part D - Sampling Generic *E. coli* Testing	
27. Written Procedures	
28. Sample Collection/Analysis	
29. Records	
Salmonella Performance Standards - Basic Requirements	
30. Corrective Actions	
31. Reassessment	
32. Written Assurance	

Part D - Continued Economic Sampling	Audit Results
33. Scheduled Sample	
34. Species Testing	O
35. Residue	
Part E - Other Requirements	
36. Export	
37. Import	
38. Establishment Grounds and Pest Control	
39. Establishment Construction/Maintenance	X
40. Light	
41. Ventilation	
42. Plumbing and Sewage	
43. Water Supply	X
44. Dressing Rooms/Lavatories	
45. Equipment and Utensils	X
46. Sanitary Operations	X
47. Employee Hygiene	
48. Condemned Product Control	
Part F - Inspection Requirements	
49. Government Staffing	
50. Daily Inspection Coverage	
51. Enforcement	X
52. Humane Handling	
53. Animal Identification	
54. Ante Mortem Inspection	
55. Post Mortem Inspection	
Part G - Other Regulatory Oversight Requirements	
56. European Community Directives	X
57. Monthly Review	
58	X
59.	

60. Observation of the Establishment

FINLAND - Est. 85 01-20-04

10/51. Fat and meat particles were observed on white tubs ready for production use. These were also re-cleaned and re-inspected before use. (9 CFR 416.13)

10. During operations, a hook with both grease and remnants of previous days' production was used to hoist a carcass leg to re-hang the carcass. This contacted the carcass and required additional trimming. This hook was cleaned before further use. We were told that this type of equipment would be added to the specifics for cleaning in the written SSOP. An establishment worker, (not normally in that position), was eviscerating carcasses and sometimes allowing the product to touch the floor of the stand he was working on. This product was condemned by the inspection service veterinarian. (9 CFR 415.15)

46/51 Fat particles were observed on over-head structures during the pre-operational sanitation inspection in the slaughter house. The overheads were re-cleaned and inspected before production began.

13/51. Establishment pre-operational sanitation inspection records did not include descriptions of the deficiencies found nor did they include complete corrective actions to include preventive measures. The descriptions presented were insufficient and included such notes as "old dirt" and "splatter". (9 CRF 416.16)

19/51. Although all aspects of verification were present in both the plan documentation and implementation, there still was some confusion about calling them "monitoring" or "verification". Also, calibration, although performed, was not clearly delineated and the frequency and procedures will be reevaluated. (9 CFR 417.4)

39/51/56. Excessive grease was observed on the rails and other overhead construction. No immediate action was taken. Additionally, a number of rusty bolts over hooks were observed. These were scheduled for correction. (9 CFR 416.2b) (EC Dir. 64/433)

43/51/56. The water supply is municipal with additional tap testing submitted by the establishment. The latest water sample results were questionable as defined by the Finish inspection. There was no follow up of this sample. There was not a clear understanding of whose responsibility this follow-up was. (9 CFR 416.2g) (EC Dir. 64/433)

45/56. An establishment employee allowed his steel to contact the stairs as he moved. He did not wash and sanitize this steel automatically, but did so after being told to by the inspection service veterinarian. No product contact was observed. (9 CFR 416.3) (EC Dir. 64/433)

58. Based on the above observations, NFA has issued a Notice-of-Intended-Delistment to this establishment.

61. NAME OF AUDITOR	62. AUDITOR SIGNATURE AND DATE
Dr. Otc Urban	M Manzoor H. Chaudry 2/17/04

United States Department of Agriculture
Food Safety and Inspection Service

Foreign Establishment Audit Checklist

1. ESTABLISHMENT NAME AND LOCATION	2. AUDIT DATE	3. ESTABLISHMENT NO.	4. NAME OF COUNTRY
Pakas tarro Oy/HK Ruokatalo Oyj VANTAA	01 – 23 - 04	6475	Finland
	5. NAME OF AUDITOR(S)		6. TYPE OF AUDIT
	Dr. Oto Urban		[X] ON-SITE AUDIT [ ] DOCUMENT AUDIT

Place an X in the Audit Results block to indicate noncompliance with requirements. Use O if not applicable.

Part A - Sanitation Standard Operating Procedures (SSOP) Basic Requirements	Audit Results
7. Written SSOP	
8. Records documenting implementation.	
9. Signed and dated SSOP, by on-site or overall authority.	
Sanitation Standard Operating Procedures (SSOP) Ongoing Requirements	
10. Implementation of SSOP's, including monitoring of implementation.	
11. Maintenance and evaluation of the effectiveness of SSOP's.	
12. Corrective action when the SSOP's have failed to prevent direct product contamination or adulteration.	
13. Daily records document item 10, 11 and 12 above.	X
Part B - Hazard Analysis and Critical Control Point (HACCP) Systems - Basic Requirements	
14. Developed and implemented a written HACCP plan .	O
15. Contents of the HACCP list the food safety hazards, critical control points, critical limits, procedures, corrective actions.	O
16. Records documenting implementation and monitoring of the HACCP plan.	O
17. The HACCP plan is signed and dated by the responsible establishment individual.	O
Hazard Analysis and Critical Control Point (HACCP) Systems - Ongoing Requirements	
18. Monitoring of HACCP plan.	O
19. Verification and validation of HACCP plan.	O
20. Corrective action written in HACCP plan.	O
21. Reassessed adequacy of the HACCP plan.	O
22. Records documenting: the written HACCP plan, monitoring of the critical control points, dates and times of specific event occurrences.	O
Part C - Economic / Wholesomeness	
23. Labeling - Product Standards	O
24. Labeling - Net Weights	O
25. General Labeling	O
26. Fin. Prod. Standards/Boneless (Defects/AQL/Pork Skins/Moisture)	O
Part D - Sampling Generic *E. coli* Testing	
27. Written Procedures	O
28. Sample Collection/Analysis	O
29. Records	O
Salmonella Performance Standards - Basic Requirements	
30. Corrective Actions	O
31. Reassessment	O
32. Written Assurance	O

Part D - Continued Economic Sampling	Audit Results
33. Scheduled Sample	O
34. Species Testing	O
35. Residue	O
Part E - Other Requirements	
36. Export	
37. Import	
38. Establishment Grounds and Pest Control	
39. Establishment Construction/Maintenance	
40. Light	
41. Ventilation	
42. Plumbing and Sewage	
43. Water Supply	
44. Dressing Rooms/Lavatories	
45. Equipment and Utensils	
46. Sanitary Operations	
47. Employee Hygiene	
48. Condemned Product Control	
Part F - Inspection Requirements	
49. Government Staffing	
50. Daily Inspection Coverage	
51. Enforcement	X
52. Humane Handling	O
53. Animal Identification	O
54. Ante Mortem Inspection	O
55. Post Mortem Inspection	O
Part G - Other Regulatory Oversight Requirements	
56. European Community Directives	
57. Monthly Review	
58.	
59.	

60. Observation of the Establishment

FINLAND - Est. 6475 01-23-04

13/51. The establishment SSOP records were frequently missing the description of deficiencies and corrective action. The establishment scheduled corrective action. (9 CFR 416.16)

61. NAME OF AUDITOR

Dr. Oto Urban

62. AUDITOR SIGNATURE AND DATE

for Manzoor H. Chaudry 2/17/04

Livsmedelsverket National Food Agency

May 12, 2004 512/43/04

Sally Stratmoen
Chief, Equivalence Section
International Policy Staff
Office of Policy, Program Development and Evaluation
Food Safety and Inspection Service
U.S. Department of Agriculture
Washington D.C. 20250
USA

Dear Ms Stratmoen

Ref: Your letter, March 12, 2004

Subject: **AUDIT REPORT FOR FINLAND, JANUARY 12 – 29, 2004**

The National Food Agency (NFA) has the following minor comments as regards the audit report, 2004:

3 Protocol

First paragraph: the name of the private laboratory is incorrect. It should read *HK Ruokatalo Oyj, Laboratory*.

6 Main findings

6.2.1 CCA Control Systems

Third paragraph, second sentence should read: *Three* of the establishments certified for U.S.-export are located in the Province of Western Finland and *two* in the Province of Southern Finland.

6.2.2 Ultimate Control and Supervision

First paragraph, first sentence should read: The tasks of the NFA include meat inspection and control in slaughterhouses and other establishments, approval of slaughterhouses and *establishments in connection with slaughterhouses*, (the rest of the sentence remains unchanged).

6.3 Headquarters Audit

The sixth bullet point of the first paragraph should read:
- *Label approval records* (delete "such as generic labels, and animal raising claims").

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National Food Agency
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00581 Helsinki, Finland
Tel. +358 9 393 1500
Fax +358 9 393 1590
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firstname.lastname@nfa.fi

8 Residue and Microbiology Laboratory Audits

The name of the private laboratory should read *HK Ruokatalo Oyj, Laboratory* (instead of Ruokatalo Oyj, Forssan Laboratory).

Foreign Establishment Audit Checklist

As regards Est. No. 85, we disagree with the following findings:

39/51/56: According to the report *no immediate action was taken* to clean the grease in the overhead rails.

The company started to clean the rails immediately but unfortunately we did not inform the auditor about the action.

43/51/56: The report states that *the latest water sample results were questionable as defined by the Finnish inspection. There was no follow up of this sample.*

It seems that there has been some misunderstanding about this matter, as the NFA personnel only detected that there was an unacceptably long delay in taking a new water sample. No other problems were identified.

Yours sincerely

Osmo Mäki-Petäys
Director
Meat and Fish Hygiene Unit

Anna-Maija Grönlund
Senior Officer
Meat and Fish Hygiene Unit